REMARKS

This Amendment, submitted in response to the Office Action dated May 19, 2003, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

The specification has been objected to for failing to comply with the written description requirement. Applicant herewith submits relevant pages of JP 7-114188 and JP 20224 to show the chemical formulae included at pages 35-36 of the specification as previously amended. Since the modifications merely make explicit what was previously incorporated by reference, the Section 112 rejection should be obviated. The JP references were set forth in the original disclosure at page 36, lines 8 and 16, respectively.

Claims 1-12 and 19-21 remain pending in the application. Claims 1, 8 and 21 have been rejected as being anticipated by Miyawaki or Byer. Claims 1, 2, 7-8 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer and further in view of Kanarian. Claims 1, 8-9 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki in view of Byer and further in view of Hosaka. Claims 1-2, 7-9 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of Kanarian or Hosaka. Claims 1, 8, 10 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of DeFornel. Claims 1-2, 7-8, 10 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of Kanarian and DeFornel. Claims 1, 3, 5-8 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of Thompson and Saigo. Claims 1-8 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view

of Kanarian, Thompson and Saigo. Claims 1-9 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of Kanarian, Hosaka, Thompson and Saigo. Claims 1-8, 10 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of Kanarian, DeFornel, Thompson and Saigo. Claims 1-8, 11 and 21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of Kanarian, Thompson, Saigo and further in view of Harada. Claims 1-8, 11-12 and 19-21 have been rejected under 35 U.S.C. § 103 as being unpatentable over Miyawaki or Byer in view of Kanarian, Thompson, Saigo, Harada, Taguchi and Yamanouchi. All references are previously of record.

To expedite prosecution of the case, Applicant has canceled claim 1 and has rewritten the dependencies of certain multiple dependent claims to exclude the dependence on claim 1. Applicant would submit that the amendment should be entered because it does not raise new issues. Applicant traverses the remaining rejections based on the following arguments.

Independent claim 2 describes forming an electrode layer, followed by formation of a photoresist on the electrode. Both the primary references Miyawaki and Byer contemplate formation of a photoresist, followed by formation of the electrode. Claim 2 is allowable over Miyawaki or Byer. None of the remaining references make up for the deficiency of the primary references.

Independent claims 3-4 describe formation of certain dual layer photoresists in combination with an electrode material to form the periodic electrode. The Examiner cites semiconductor references such as Thompson and Saigo to make up for the deficiencies in

Miyawaki and Byer regarding the missing multi-layer photoresists. Applicant would submit that one skilled in the art would not combine the teachings of Thompson and Saigo with the primary references. At a minimum, to the extent that Thompson and Saigo teach multi-layer resists, they are directed towards masking of silicon-based semiconductors. This is fundamentally a different material than the ferroelectric materials of the claims and the primary references. This difference is significant because the effectiveness of a photoresist will depend on its adhesion and other properties relative to the materials being masked. Therefore, one skilled in the art would not apply the resists of Thompson or Saigo with either Miyawaki or Byer. All rejections based on the various permutations of these references are traversed on this basis.

The remaining claims 5-12 and 19-21 are patentable based on the various dependencies on claims 2-4.

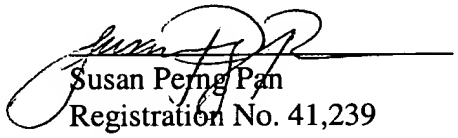
With further regard to claims 12, 19 and 20, these claims describe physical dimensions of structures not taught or suggested by the art. Claim 12 describes an electrode has a line width of at most 0.3 micrometers. The dimensions (0.5 micrometers) taught by Taguchi exceed the recited range. Claim 20 describes a period of regions of 1.0-4.6 micrometers. The Examiner admits that Yamanouchi is 0.6 micrometers, which is out of the range. Claim 19 describes a ratio of the two dimensions of less than 0.15. However the ratio of width/pitch in the cited art is (0.5)/(0.6) is more than the recited ratio. Therefore, claims 12 and 19-20 are patentable for these additional reasons.

In view of the above, Applicant submits that claims 2-12 and 19-21 are in condition for allowance. Therefore it is respectfully requested that the subject application be passed to issue at

the earliest possible time. The Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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Date: August 19, 2003